

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PLAINTIFF PACITO; PLAINTIFF ESTHER;
PLAINTIFF JOSEPHINE; PLAINTIFF SARA;
PLAINTIFF ALYAS; PLAINTIFF MARCOS;
PLAINTIFF AHMED; PLAINTIFF RACHEL;
PLAINTIFF ALI; HIAS, INC.; CHURCH
WORLD SERVICE, INC.; and LUTHERAN
COMMUNITY SERVICES NORTHWEST,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; MARCO RUBIO,
in his official capacity as Secretary of State;
KRISTI NOEM, in her official capacity as
Secretary of Homeland Security; DOROTHY A.
FINK, in her official capacity as Acting Secretary
of Health and Human Services,

Defendants.

Case No. C25-255 JNW

**DECLARATION OF JONATHAN P.
HAWLEY IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

I, Jonathan P. Hawley, hereby declare as follows:

1. I am over the age of eighteen and competent to make this declaration. I am an attorney with the law firm Perkins Coie LLP and counsel for Plaintiffs in the above-captioned matter. I make this declaration based on personal knowledge about which I am competent to testify.

DECL. OF JONATHAN P. HAWLEY
(No. C25-255 JNW)

Perkins Coie LLP
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1 2. I submit this declaration to provide the Court true and correct copies of certain
2 documents submitted in support of Plaintiffs' motion for temporary restraining order and
3 preliminary injunction:

4 **Exhibit 1** is a true and correct screen capture of the webpage titled "Refugee Admissions,"
5 which contains archived content released online from January 20, 2021, to January 20, 2025. The
6 webpage was captured at my direction on February 11, 2025, and is available on the U.S.
7 Department of State website at <https://2021-2025.state.gov/refugee-admissions>.

8 **Exhibit 2** is a true and correct screen capture of the first tab of the document titled
9 "Summary of Refugee Admissions as of 31-December-2024." The report was captured at my
10 direction on February 11, 2025, and is available on the Refugee Processing Center website at
11 <https://www.wrapsnet.org/admissions-and-arrivals> (click "Refugee Admissions Report as of
12 December 31, 2024").

13 **Exhibit 3** is a true and correct copy of the document titled "Proposed Refugee Admissions
14 for Fiscal Year 2025." The report was downloaded at my direction on February 11, 2025, and is
15 available on the U.S. Department of State website at [https://www.state.gov/wp-content/uploads/
16 2024/10/Report-Proposed-Refugee-Admissions-for-FY25.pdf](https://www.state.gov/wp-content/uploads/2024/10/Report-Proposed-Refugee-Admissions-for-FY25.pdf).

17 **Exhibit 4** is a true and correct screen capture of the webpage titled "Presidential
18 Determination on Refugee Admissions for Fiscal Year 2025." The webpage was captured at my
19 direction on February 11, 2025, and is available on the Federal Register website at [https://
20 www.federalregister.gov/documents/2024/10/18/2024-24321/presidential-determination-on-
21 refugee-admissions-for-fiscal-year-2025](https://www.federalregister.gov/documents/2024/10/18/2024-24321/presidential-determination-on-refugee-admissions-for-fiscal-year-2025).

22 **Exhibit 5** is a true and correct copy of the document titled "United States Refugee
23 Admissions Program (USRAP)." The document was downloaded at my direction on February 10,
24 2025, and is available on the U.S. Citizenship and Immigration Services website at [https://
25 www.uscis.gov/sites/default/files/document/charts/USRAP_FlowChart.pdf](https://www.uscis.gov/sites/default/files/document/charts/USRAP_FlowChart.pdf).

1 **Exhibit 6** is a true and correct screen capture of the webpage titled “Resettlement Process.”
 2 The webpage was captured at my direction on February 11, 2025, and is available on the Refugee
 3 Council USA website at <https://rcusa.org/resources/resettlement-process>.

4 **Exhibit 7** is a true and correct screen capture of the webpage titled “U.S. Resettlement
 5 Partners.” The webpage was captured at my direction on February 11, 2025, and is available on
 6 the UN Refugee Agency website at [https://www.unhcr.org/us/what-we-do/resettlement-united-](https://www.unhcr.org/us/what-we-do/resettlement-united-states/u-s-resettlement-partners)
 7 [states/u-s-resettlement-partners](https://www.unhcr.org/us/what-we-do/resettlement-united-states/u-s-resettlement-partners).

8 **Exhibit 8** is a true and correct screen capture of the webpage titled “Domestic Refugee
 9 Resettlement—the Reception and Placement Program and Welcome Corps,” which contains
 10 archived content released online from January 20, 2021, to January 20, 2025. The webpage was
 11 captured at my direction on February 11, 2025, and is available on the U.S. Department of State
 12 website at <https://2021-2025.state.gov/refugee-admissions/domestic-resettlement>.

13 **Exhibit 9** is a true and correct copy of the document titled “Population, Refugees, and
 14 Migration.” The document was downloaded at my direction on February 10, 2025, and is available
 15 on the Refugee Processing Center website at [https://www.wrapsnet.org/documents/](https://www.wrapsnet.org/documents/FY%202023%20Reception%20&%20Placement%20Fact%20Sheet.pdf)
 16 [FY%202023%20Reception%20&%20Placement%20Fact%20Sheet.pdf](https://www.wrapsnet.org/documents/FY%202023%20Reception%20&%20Placement%20Fact%20Sheet.pdf).

17 **Exhibit 10** is a true and correct copy of the document titled “90-Day Report in Compliance
 18 with Settlement Agreement for Executive Order 13815, *Doe (JFS) v. Trump*.” The document was
 19 provided to me by counsel of record in the matters of *Doe v. Trump*, No. C17-0178JLR (W.D.
 20 Wash.), and *Jewish Family Service of Seattle v. Trump*, No. C17-1707JLR (W.D. Wash.).

21 **Exhibit 11** is a true and correct screen capture of the article titled “Resettlement Agencies
 22 Race to Help Refugees Ahead of Trump’s Second Term.” The article was captured at my direction
 23 on February 11, 2025, and is available on the Associated Press website at [https://apnews.com/](https://apnews.com/article/refugees-trump-resettlement-connecticut-6ad8a0504c6094cdf4c33e491fa25bc6)
 24 [article/refugees-trump-resettlement-connecticut-6ad8a0504c6094cdf4c33e491fa25bc6](https://apnews.com/article/refugees-trump-resettlement-connecticut-6ad8a0504c6094cdf4c33e491fa25bc6).

25 **Exhibit 12** is a true and correct screen capture of the press release titled “Governor Healey
 26 Declares State of Emergency, Calls for Support for Newly Arriving Migrant Families.” The press

1 release was captured at my direction on February 11, 2025, and is available on the Commonwealth
2 of Massachusetts website at [https://www.mass.gov/news/governor-healey-declares-state-of-](https://www.mass.gov/news/governor-healey-declares-state-of-emergency-calls-for-support-for-newly-arriving-migrant-families)
3 [emergency-calls-for-support-for-newly-arriving-migrant-families](https://www.mass.gov/news/governor-healey-declares-state-of-emergency-calls-for-support-for-newly-arriving-migrant-families).

4 **Exhibit 13** is a true and correct copy of the document titled “Emergency Executive Order
5 No. 224.” The document was downloaded at my direction on February 11, 2025, and is available
6 on the City of New York website at [https://www.nyc.gov/assets/home/downloads/pdf/executive-](https://www.nyc.gov/assets/home/downloads/pdf/executive-orders/2022/eeo-224.pdf)
7 [orders/2022/eeo-224.pdf](https://www.nyc.gov/assets/home/downloads/pdf/executive-orders/2022/eeo-224.pdf).

8 **Exhibit 14** is a true and correct copy of the declaration of Plaintiff Pacito, dated February 8,
9 2025.

10 **Exhibit 15** is a true and correct copy of the declaration of Plaintiff Esther, dated February 9,
11 2025.

12 **Exhibit 16** is a true and correct copy of the declaration of Plaintiff Josephine, dated
13 February 9, 2025.

14 **Exhibit 17** is a true and correct copy of the declaration of Plaintiff Sara, dated February 9,
15 2025.

16 **Exhibit 18** is a true and correct copy of the declaration of Plaintiff Alyas, dated February 8,
17 2025.

18 **Exhibit 19** is a true and correct copy of the declaration of Plaintiff Marcos, dated
19 February 6, 2025.

20 **Exhibit 20** is a true and correct copy of the declaration of Plaintiff Ali (with
21 Attachment A), dated February 7, 2025.

22 **Exhibit 21** is a true and correct copy of the declaration of Plaintiff Ahmed, dated
23 February 6, 2025.

24 **Exhibit 22** is a true and correct copy of the declaration of Plaintiff Rachel, dated
25 February 8, 2025.

Exhibit 23 is a true and correct copy of the declaration of Richard L. Santos (with Attachment A), dated February 11, 2025.

Exhibit 24 is a true and correct copy of the declaration of Mark Hetfield (with Attachment A), dated February 11, 2025.

Exhibit 25 is a true and correct copy of the declaration of David Duea, dated February 11, 2025.

* * *

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED this 11th day of February, 2025, at Seattle, Washington.

s/ Jonathan P. Hawley
Jonathan P. Hawley